

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,

Plaintiff,

V.

STEVEN DONZIGER, et al.,

Defendants.

$$\begin{matrix} \mathbf{X} \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \vdots \\ \mathbf{X} \end{matrix}$$

11 Civ. 0691 (LAK)

**DECLARATION OF ANNE CHAMPION IN SUPPORT OF  
CHEVRON CORPORATION'S SUPPLEMENTAL BRIEF REGARDING  
THE CONTEMPT IMPLICATIONS OF DONZIGER'S RETENTION AGREEMENTS  
AND OTHER AGREEMENTS AMONG ENTITIES WITH  
INTERESTS IN THE ECUADORIAN JUDGMENT**

I, ANNE CHAMPION, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, and I am counsel for Chevron Corporation (“Chevron”) in the above-captioned matter. I am personally familiar with the facts set forth herein, unless the context indicates otherwise. I make this declaration in support of Chevron’s supplemental brief regarding the contempt implications of Steven Donziger’s retention agreements and other agreements among entities with interests in the Ecuadorian judgment.

2. Attached as **Exhibit 1** is a true and correct copy of PX 552. PX 552 is a November 9, 2010 email from A. Nicol to L. Hamilton, W. Carmody, S. Donziger, and others re “Ecuador - Funding Agreement and Intercreditor Agreement,” attaching an executed version of a

funding agreement between Treca Financial Solutions and Claimants and an executed version of the Intercreditor Agreement.

3. Attached as **Exhibit 2** is a true and correct copy of PX 558. PX 558 is a January 5, 2011 retainer agreement among the Lago Agrio Plaintiffs (represented by P. Fajardo), El Frente de Defensa de la Amazonia (represented by E. Chávez), the Asamblea de Afectados por Texaco (represented by L. Yanza), and Donziger & Associates, PLLC.

4. Attached as **Exhibit 3** is a true and correct copy of PX 657. PX 657 is a February 27, 2013 document titled “Memorandum of Association of Amazonia Recovery Limited.”

5. Attached as **Exhibit 4** is a true and correct copy of Plaintiff’s Deposition Exhibit 5306. This document is a January 29, 2013 Subscription Deed for Amazonia Recovery Limited.

6. Attached as **Exhibit 5** is a true and correct copy of Plaintiff’s Deposition Exhibit 5105. This document is a certified English translation of an April 27, 2012 document titled “Articles of Incorporation, and Discussion and Approval of the Statutes of the Union of People Affected by Texaco’s Petroleum Operations.”

7. Attached as **Exhibit 6** is a true and correct copy of a document dated November 1, 2017 titled “Durable International Power of Attorney and Agreement for the Continuous Investment of Professional Services.” This document was first produced to Chevron by Steven Donziger at the conclusion of the June 28, 2018 contempt hearing.

8. Attached as **Exhibit 7** is a true and correct copy of a May 1, 2015 settlement agreement between Chevron Corporation, Woodsford Litigation Funding Limited, and Temeraire Limited.

9. Attached as **Exhibit 8** is a true and correct copy of a February 13, 2015 settlement agreement between Chevron Corporation, James Russell DeLeon, Torvia Limited, and Julian Ross Jarvis.

10. Attached as **Exhibit 9** are true and correct copies of excerpts from the transcript of the June 25, 2018 deposition of Steven Donziger.

11. Attached as **Exhibit 10** are true and correct copies of excerpts from the transcript of the June 28, 2018 contempt hearing.

12. Attached as **Exhibit 11** is a true and correct copy of contempt hearing exhibit GR 3. This document consists of Lee Grinberg's handwritten notes from the November 6, 2017 Elliott meeting.

13. Attached as **Exhibit 12** is a true and correct copy of contempt hearing exhibit GR 3a. This document consists of Katie Sullivan's handwritten notes from the November 6, 2017 Elliott meeting.

14. Attached as **Exhibit 13** is a true and correct copy of a March 1, 2013 Shareholders' Agreement between Torvia Limited; Servicios Fromboliere Compañía, Limitada; Donziger & Associates, PLLC; El Frente de Defensa de la Amazonia; and Amazonia Recovery Limited.

15. Attached as **Exhibit 14** is a true and correct copy of PX 9006. PX 9006 is a November 6, 2017 email from A. Page to S. Donziger and others re "RE: Chevron case: Meeting today FYI."

Executed on this 24<sup>th</sup> day of July, 2018 at New York, New York.

/s/ Anne Champion  
Anne Champion